

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

MAWSON INFRASTRUCTURE GROUP, INC.,

Alleged Debtor.

Chapter 11

Case No. 24-12726 (MFW)

Re: Dkt. Nos. 163, 164

**LIMITED OBJECTION AND RESERVATION OF RIGHTS OF CELSIUS  
NETWORK LIMITED REGARDING MARSHALL’S MOTION PURSUANT TO  
BANKRUPTCY CODE SECTION 303(I) AND BANKRUPTCY RULES 9023  
AND 9024 FOR ORDER (I) DISMISSING ALLEGED DEBTORS REQUEST FOR  
BOND, (II) SCHEDULING REHEARING ON ALLEGED DEBTORS MOTION  
FOR ORDER FOR (A) BOND PURSUANT TO 11 U.S.C. § 303(E) AND  
(B) SANCTIONS FOR VIOLATION OF AUTOMATIC STAY OR  
(III) RECONSIDERING THE AUGUST 11 BENCH RULING ON SUCH  
MOTION AND MOTION TO DISMISS PETITION OF MARSHALL  
INVESTMENTS GCP PTY LIMITED (F/K/A MARSHALL INVESTMENTS  
MIG PTY LTD) AS TRUSTEE FOR THE MARSHALL  
INVESTMENTS MIG TRUST AS PETITIONING CREDITOR**

Celsius Network Limited (“**Celsius**”), acting by and through the Blockchain Recovery Investment Consortium LLC, in its capacity as Complex Asset Recovery Manager and Litigation Administrator for Celsius Network LLC and its affiliated Post-Effective Date Debtors, hereby files this limited objection and reservation of rights (the “**Limited Objection**”) regarding *Marshall’s Motion Pursuant to Bankruptcy Code Section 303(i) and Bankruptcy Rules 9023 and 9024 for Order (I) Dismissing Alleged Debtors Request for Bond, (II) Scheduling Rehearing on Alleged Debtors Motion for Order for (A) Bond Pursuant to 11 U.S.C. § 303(e) and (B) Sanctions for Violation of Automatic Stay or (III) Reconsidering the August 11 Bench Ruling On Such Motion* (the “**Rehearing Motion**”) and the *Motion to Dismiss Petition of Marshall Investments GCP Pty Limited*

*(f/k/a Marshall Investments MIG Pty Ltd) as Trustee for the Marshall Investments MIG Trust as Petitioning Creditor (the “**Motion to Dismiss**”).*<sup>1</sup> In furtherance of the Limited Objection, Celsius respectfully states as follows:

1. Celsius takes no position with respect to the Rehearing Motion to the extent that it seeks to modify the terms of any sanctions. However, Celsius objects to the Rehearing Motion to the extent it seeks a reversal or modification of the Court’s finding that the Petitioning Creditors violated the automatic stay.

2. Celsius (i) reserves all rights to supplement this Limited Objection for purposes of any further hearing on the Rehearing Motion, including, without limitation, any evidentiary hearing, and (ii) reserves all rights with respect to the Motion to Dismiss, including, without limitation, rights regarding the treatment of its claims and the conditions for any dismissal relating to the winding up proceeding in the Federal Court of Australia.

Dated: September 3, 2025  
Wilmington, Delaware

**VENABLE LLP**

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<sup>1</sup> All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Rehearing Motion.

and

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